

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOHN T. DOE and JOHN U. DOE,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	Case No. 25-cv-4354
THE CATHOLIC BISHOP OF CHICAGO, a	)	
Corporation sole, and THE ARCHDIOCESE	)	District Judge LaShonda A. Hunt
OF CHICAGO,	)	
	)	Cook County Case Nos. 24 L 14871
Defendants.	)	24 L 14875
	)	
THE CATHOLIC BISHOP OF CHICAGO, a	)	
corporation sole,	)	
Plaintiff,	)	
	)	
v.	)	
	)	
JOHN T. DOE, JOHN U. DOE, DOE 101	)	
DOE 102, DOE 103, DOE 104, and DOE 105	)	
	)	
Defendants.	)	

**PLAINTIFF/COUNTER-DEFENDANT’S JURISDICTIONAL STATEMENT**

Counter-Defendants, JOHN T. DOE and JOHN U. DOE (“Counter-Defendants”), by and through their respective counsel, hereby tender to this Court a Jurisdictional Statement in response to the Court’s inquiry in Docket Entry #9 and in support thereof state as follows:

Upon review of the precedent cited in the Court’s inquiry regarding jurisdiction, Docket Entry #9, Plaintiffs/Counter-Defendants, Plaintiffs acknowledge that removal would be improper. Accordingly, Plaintiffs/Counter-Defendants do not object to a remand back to state court. Plaintiffs/Counter-Defendants do so while preserving all rights to claims and/or defenses or

likewise in State Court and nothing in this statement shall be construed as a waiver of such. Plaintiffs/Counter-Defendants believe that the dissent's (5-4 opinion) position in *Home Depot U.S.A. Inc. v. Jackson*, 587 U.S. 435, 441 (2019) is the correct interpretation of removal law. However, recognizing the majority opinion's binding effect on jurisdiction in Federal Court relating to removal, Plaintiffs/Counter-Defendants do not object to a remand back to State Court. **WHEREFORE**, Counter-Defendants JOHN T. DOE and JOHN U. DOE, hereby do not maintain any objection to the matter being remanded back to state court and any other relief this Court deems appropriate.

Dated: April 29, 2025

Respectfully Submitted,

/s/ Alexander Michael  
Alexander Michael  
Ettinger and Associates  
12413 S. Harlem Avenue, #203  
Palos Heights, IL 60463

**CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2025, the foregoing was electronically served on all counsel of record in this case via the Court's ECF system.

/s/Alexander Michael